

McMANIMON, SCOTLAND & BAUMANN, LLC
75 Livingston Avenue, Suite 201
Roseland, New Jersey 07068
(973) 622-1800
Anthony Sodono, III (asodono@msbnj.com)
Sari B. Placona (splacona@msbnj.com)
Attorneys for Romulo Hernandez and Maria E. Hernandez

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:
NEW ENGLAND MOTOR FREIGHT, INC., et. al.¹
Debtors.

Chapter 11
Case No. 19-12809-JKS

**NOTICE OF CREDITORS ROMULO HERNANDEZ AND
MARIA E. HERNANDEZ'S MOTION FOR AN ORDER
GRANTING RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that on June 28, 2022, at 10:00 a.m., or as soon thereafter as counsel may be heard, creditors Romulo Hernandez ("Mr. Hernandez") and Maria E. Hernandez ("Mrs. Hernandez") (collectively, the "Creditors"), shall move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King Jr. Building, 50 Walnut Street, Newark, New Jersey 07102, in support of their Motion for an Order Granting Relief from the Automatic Stay, Creditors' right to file a late Proof of Claim, and for such other and further relief as the Court deems just and equitable (the "Motion").

¹ The Debtors in these Chapter 11 cases and the last four digits of each Debtor's taxpayer identification number as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Creditors will rely upon the accompanying Memorandum of Law in Support of the Motion, and the Certification of Matthew S. Crosby, Esq., in Support of the Motion, with exhibits annexed thereto.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-1(b), the undersigned shall request waiver of the stay under Fed. R. Bankr. P. 4001(a)(3).

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

McMANIMON, SCOTLAND & BAUMANN, LLC
Attorneys for Romulo Hernandez and Maria E. Hernandez

By: _____ /s/ *Anthony Sodono, III*
Anthony Sodono, III

Dated: June 7, 2022